

# **EXHIBIT A-19**

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JAMES HAYDEN,

Plaintiff,

-vs-

CASE NO. 1:17CV2635

2K GAMES, INC., et al.,

Defendants.

---

Deposition of JONATHON HAYDEN

Cleveland, Ohio

Wednesday, January 29, 2020 - 9:08 a.m.

Reported by:

Pamela S. Greenfield, RDR, CRR

Job No: 26855

1 A. I don't know. Depends. A lot of tattoos are  
2 customized for sure.

3 Q. Does that mean that there are some tattoos that  
4 are not custom?

5 MR. ALEXANDER: Objection. Vague.

6 Sorry.

7 THE WITNESS: I'm sorry.

8 A. They all, they all turn into custom pieces.

9 Q. What does that mean?

10 A. They could be a regular piece that a person will  
11 come in to, come in with and it will be, the next  
12 thing you know, it turns into a custom piece.

13 Q. So a person might come in with a design?

14 A. Yeah.

15 Q. Then you may have a conversation about what the  
16 tattoo would ultimately look like?

17 A. No. They usually come in and understand that  
18 they usually give us our artistic freedom, so we  
19 produce our certain style that they come in for.

20 Q. Customers come in and expect you to give them a  
21 certain style of tattoo?

22 A. They expect --

23 MR. ALEXANDER: Objection. It  
24 mischaracterizes his testimony.

25 A. Depends.